The Honorable Richard A. Jones 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 TELECOMMUNICATION SYSTEMS, INC., **CONSOLIDATED UNDER:** 10 2:19-CV-00644-RAJ NO. Plaintiff, 11 NO. 2:19-CV-00336-RAJ 12 NO. 2:19-CV-00644-RAJ 13 LYNNE HOUSERMAN and MOTOROLA SOLUTIONS, INC., 14 NOTICE OF INTENT TO REQUEST REDACTION Defendants. 15 16 LYNNE HOUSERMAN, 17 Plaintiff, 18 v. 19 20 COMTECH TELECOMMUNICATIONS CORPORATION, FRED KORNBERG, AND 21 MICHAEL D. PORCELAIN, 22 Defendants. 23 Pursuant to Sections 4 and 5 of the United Stated District Court for the Western District 24 of Washington's Amended General Order No. 15-15, TeleCommunication Systems, Inc. 25 ("TCS"), Comtech Telecommunications Corp. ("Comtech"), Fred Kornberg, and Michael D. 26 27 SAVITT BRUCE & WILLEY LLP

NOTICE OF INTENT TO REQUEST REDACTION - 1 No. 2:19-CV-00644-RAJ SAVITT BRUCE & WILLEY LLP 1425 Fourth Avenue Suite 800 Seattle, Washington 98101-2272 (206) 749-0500 Porcelain (collectively, the "Comtech Parties"), by and through their undersigned counsel, hereby give notice of intent to request redaction of information from the following transcripts:

- 1. The March 8, 2021 Motion Hearing regarding the Comtech Parties' request to continue the trial date (see Dkt. 191); and
  - 2. The March 9, 2021 Motion Hearing on the same subject (Dkt. 209).

The Court previously granted "[l]eave to redact to portions of the hearing record that relate to disclosure of Mr. Kornberg's medical records or history" (sic) (Dkt. 212), and, per instructions from the Court, the Comtech Parties intend to work with counsel for Lynne Houserman and Motorola Solutions, Inc. to file a stipulated or unopposed motion to request redaction of portions of the record that fit this category, with a copy served on the court reporter within 21 days from filing of this Notice.

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SAVITT BRUCE & WILLEY LLP 1425 Fourth Avenue Suite 800 Seattle, Washington 98101-2272 (206) 749-0500

DATED: March 12, 2021. 2 SAVITT BRUCE & WILLEY LLP 3 By s/James P. Savitt 4 James P. Savitt, WSBA #16847 Michele L. Stephen, WSBA #39458 5 1425 Fourth Avenue Suite 800 6 Seattle, Washington 98101-2272 Telephone: (206) 749-0500 7 Facsimile: (206)749-0600 Email: jsavitt@sbwLLP.com 8 Email: mstephen@sbwLLP.com 9 PAUL, WEISS, RIFKIND, WHARTON 10 & GARRISON LLP 11 By s/Harris Fischman Harris Fischman (admitted *pro hac vice*) 12 Alyson A. Cohen (admitted pro hac vice) David Fish (admitted *pro hac vice*) 13 Leah J. Park (admitted pro hac vice) 14 Megan L. Gao (admitted pro hac vice) Charles P. Sucher (admitted pro hac vice) 15 1285 Avenue of the Americas New York, New York 10019 16 Telephone: (212) 373-3000 Facsimile: (212) 757-3990 17 Email: hfischman@paulweiss.com 18 acohen@paulweiss.com dfish@paulweiss.com 19 lpark@paulweiss.com mgao@paulweiss.com 20 csucher@paulweiss.com 21 Martha L. Goodman (admitted pro hac vice) 22 2001 K Street, NW Washington, DC 20006-1047 23 Telephone: (202) 223-7341 Facsimilie: (202) 330-5921 24 Email: mgoodman@paulweiss.com 25 Attorneys for TeleCommunication Systems, Inc., 26 Comtech Telecommunications Corp., Fred Kornberg, and Michael D. Porcelain 27

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on March 12, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 12th day of March, 2021 at Seattle, Washington.

Nate Garberich